

Addressing Non-Conformances, Corrective and Preventive Action

I. PURPOSE

The purpose of this procedure is to define the responsibility and authority within EPA Region 9 for handling and investigating EMS non-conformances, for taking action to mitigate any impacts caused, and for initiating and completing corrective and preventive actions.

II. SCOPE

This procedure applies to the EMS at the EPA Region 9 office.

III. GENERAL INFORMATION

Non-conformance: Non-conformances are any deviations from established procedures, programs and other arrangements related to the EMS. They may include non-compliances to regulations, but not all non-compliances are necessarily non-conformances of the EMS. An EMS audit (internal or third-party) makes findings of non-conformance.

Corrective Action: Corrective action is generally a reactive process used to address problems after they have occurred.

Preventive Action: Preventive action is generally a proactive process intended to prevent potential problems before they occur or become more severe. Preventive action focuses on identifying negative trends and addressing them before they become significant

Root Cause Analysis: Root cause analysis is the method used to identify the immediate, underlying and root causes of an incident. The root causes are then used to recommend remedial action that will prevent incidents of a similar type occurring in the future.

IV. APPROACH

1. Whenever a non-conformance in the EMS is detected (e.g. through audits or observations or measurements), the EMS Lead is notified about the non-conformance,

2. The EMS Lead confers with the affected SEA Lead/staff/manager on actions to take to mitigate any impacts caused by the non-conformance and for initiating and completing corrective action by conducting an investigation using root cause analysis,
3. The affected SEA Lead/staff/manager is responsible to ensure that the corrective action is completed as agreed with the EMS Lead,
4. Any corrective action taken to eliminate the causes of actual and potential nonconformance shall be appropriate to the magnitude of the problems and commensurate with the environmental impact encountered,
5. The EMS Lead confers with the affected SEA Lead/staff/manager to take all necessary steps to ensure that the non-conformance does not recur. The approach followed for preventive actions is the same one used for findings of non-conformance in an EMS audit,
6. The affected SEA Lead/staff/manager is responsible to ensure that the preventive action is completed as agreed with the EMS Lead.
7. The EMS Lead reviews the effectiveness of corrective and preventive actions taken.

V. RECORDS

Records generated by this procedure include the following:

1. Records that list the instances of non-conformances found in the EMS, the date of their occurrence, date of corrective action, and date of completion of preventive action
2. Records that reflect the analysis of the non-conformance and the nature of the corrective and preventive actions that were taken with respect to it
3. Records that reflect EMS Lead review of effectiveness of corrective and preventive actions.

IV. REVISION HISTORY

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